

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMPSON PRODUCTS, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-11810-RGS
)	
GLENN THOMPSON, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

ANSWER TO COUNTERCLAIM

Plaintiff, Thompson Products, Inc. ("TPI"), by counsel, for its answer to the Counterclaim filed herein by Defendants, Glenn Thompson and Splash Creations, Inc. (collectively referred to herein as "Defendants"), says as follows:

FIRST DEFENSE

Neither the Counterclaim as a whole nor any of the counts therein state a claim for relief against TPI.

SECOND DEFENSE

Robert Jackson is not a servant or employee of TPI for whose acts TPI is vicariously liable.

THIRD DEFENSE

The alleged statements are true.

FOURTH DEFENSE

The alleged statements are opinions and not actionable.

FIFTH DEFENSE

The alleged statements are privileged and not actionable.

SIXTH DEFENSE

Defendants have not been injured in the manner or to the extent alleged in the Counterclaim.

SEVENTH DEFENSE

As for the specific allegations contained in the Counterclaim, TPI says as follows:

1. TPI admits the allegations contained in paragraph 1.
2. TPI is without sufficient information to admit or deny the allegations contained in paragraph 2.
3. TPI admits the allegations contained in paragraph 3.
4. As to the allegations contained in paragraph 4, TPI denies those in the first sentence and admits those in the second sentence.
5. TPI denies the allegations contained in paragraph 5.
6. TPI denies the allegations contained in paragraph 6.
7. TPI is without sufficient information to admit or deny the allegations contained in paragraph 7.
8. TPI admits the allegations contained in paragraph 8.
9. In response to the allegations contained in paragraph 9, TPI incorporates here paragraphs 1 through 8 above.
10. TPI denies the allegations contained in paragraph 10.
11. TPI denies the allegations contained in paragraph 11.
12. TPI denies the allegations contained in paragraph 12.
13. In response to the allegations contained in paragraph 13, TPI incorporates here paragraphs 1 through 8 above.

14. TPI denies the allegations contained in paragraph 14.

15. TPI denies the allegations contained in paragraph 15.

16. TPI denies that Defendants are entitled to any of the relief requested in paragraphs (a) through (d).

THOMPSON PRODUCTS, INC.

By its attorneys,

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DATED: January 27, 2006

CERTIFICATE OF SERVICE

I, Andrew D. Kang, hereby certify that on the 27th day of January, 2006, I served the foregoing by U.S. Mail to the following counsel of record:

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